

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., No. 1:02-cv-06977 (GBD)(SN)

**PLAINTIFF DAE JIN RYOOK, INDIVIDUALLY AND AS ADMINISTRATOR OF THE ESTATE OF
CHRISTINA S. RYOOK, DECEASED, AS ALL SURVIVORS OF CHRISTINA S. RYOOK'S
NOTICE OF MOTION FOR PARTIAL FINAL JUDGMENTS FOR DAMAGES ON BEHALF OF
THE PLAINTIFFS**

PLEASE TAKE NOTICE that upon the supporting Memorandum of Law and the Declaration of Sandra M. Kelly, (“Kelly Declaration”) and exhibits annexed thereto, and the exhibits submitted with access restricted to the Court pursuant to the May 5, 2022 Order, ECF No. 7963, pertaining to expert reports submitted in support of default judgments, plaintiffs in the above-captioned matter who is identified in Exhibit B-1 and C annexed to the Proposed Order, by and through their counsel, Ray Robinson Law Co., LPA, respectfully move this Court for an ORDER:

1) awarding the Plaintiffs identified in Exhibit B-1 damages judgments against the Islamic Republic of Iran (“Iran”) in the same amounts previously awarded by this Court to various similarly situated plaintiffs in Burnett, Havlish, Ashton, Bauer, O’Neill, and other cases; AND,

2) awarding solatium damages to those Plaintiffs identified in Exhibit B-1 in the amounts of \$8,500,000 per parent; AND,

3) awarding the estates of the 9/11 decedents, through the personal representatives and on behalf of all survivors and all legally entitled beneficiaries and family member of such 9/11 decedents, as set forth in Exhibit B, compensatory damages for pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11th attacks, as set forth in Exhibit B-1; AND,

4) awarding compensatory damages to Plaintiff identified in Exhibit B-1 for decedents’ pain and

suffering in an amount of \$2,000,000 per estate, as set forth in annexed Exhibit B-1; AND,

5) awarding the estates of the 9/11 decedents, through their personal representatives and on behalf of all survivors and all legally entitled beneficiaries and family members of such 9/11 decedent, as identified in Exhibit B-1, an award of economic damages in the amounts set forth in Exhibit B-1; AND,

6) awarding the Plaintiff identified in Exhibit B-1 prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the damages judgment; AND,

7) granting the Plaintiffs identified in Exhibit B-1 and Exhibit C permission to seek punitive damages, economic damages, and other appropriate damages, later, to the extent such awards have not previously been addressed; AND, granting permission for all other Plaintiffs in these actions not appearing in Exhibit B-1 to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; AND,

8) granting to the Plaintiffs in Exhibit B-1 and Exhibit C such other and further relief as this Honorable Court deems just and proper.

Plaintiffs' request is made in connection with the judgments on default as to liability entered against Iran as set forth in Exhibit A to the Proposed Order.

Dated: July 19, 2024

Respectfully submitted,

/s/ Sandra M. Kelly

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